

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

LIGHT TRANSFORMATION
TECHNOLOGIES, LLC,

V.

LIGHTING SCIENCE GROUP
CORP., *et al.*

Civil Action No. 2:12-cv-826-MHS-RSP

LEAD CASE

CONSOLIDATED

LIGHT TRANSFORMATION
TECHNOLOGIES LLC

v.

GENERAL ELECTRIC COMPANY, *et al.*

Civil Action No. 2:12-cv-827-MHS-RSP

JOINT SUBMISSION OF PATENT RULE 4-5(D) CHARTS

Plaintiff Light Transformation Technologies LLC (“LTT”) and defendants Lighting Science Group Corporation (“LSG”); Home Depot U.S.A., Inc. (“Home Depot”); General Electric Company; GE Lighting Solutions, LLC, GE Lighting, Inc., GE Lighting, LLC, GE Lighting Systems, LLC, and GE Lighting Systems, Inc. (collectively “GE”); and Wal-Mart Stores, Inc. (“Walmart”) (collectively “Defendants”) submit herewith their Claim Construction Charts pursuant to P.R. 4-5(d). Plaintiff and Defendants have not been able to agree upon the format for their charts that would be most helpful to the Court and therefore provide their proposed charts separately. Plaintiff’s chart is attached as Exhibit A; Defendants’ chart is submitted as Exhibit B. The charts differ in the following respects: (1) Plaintiff’s chart contains certain underlining within the parties’ competing constructions that Plaintiff contends are helpful to highlight for the Court the differences between the parties’ constructions, whereas Defendants’ chart removes the underlining because Defendants view the underlining as inconsistent and misleading with respect to the actual differences; and (2) Defendant’s chart includes

the '911 patent, which Plaintiff is no longer asserting but nonetheless remains the subject of Defendants' counterclaims as of the filing of this paper.

Date: June 3, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

Date: June 3, 2014

/s/ Henry Pogorzelski
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